

UNITED STATES DISTRICT COURT
SEALED for the
District of Nebraska

United States of America)
v.)
) Case No. 8:20mj356
TERRANCE TRAYNHAM)
))
))
))

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 11, 2020 in the county of Douglas in the

District of Nebraska, the defendant(s) violated:

Code Section

21 U.S.C. §§ 841(a)(1) and
(b)(1)(C)

Offense Description

Distribution of a Schedule II Controlled Substance

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.



Complainant's signature

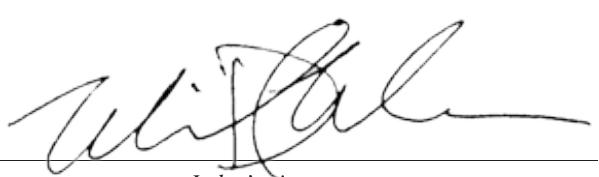
Special Agent Paul Voss, FBI

Printed name and title

Sworn to before me and signed in my presence.

Sworn to before me by telephone or other reliable
electronic means.

Date: 07/18/2020



Judge's signature

City and state: Omaha, Nebraska

U.S. Magistrate Judge Michael D. Nelson

Printed name and title

UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA

Affidavit for Criminal Complaint and Arrest Warrant

1. I, Paul Voss, being duly sworn on oath, depose and state the following:
2. I am a Special Agent (SA) with Federal Bureau of Investigation (FBI) and have been so assigned since July of 2019. I am currently assigned to the Safe Streets Task Force (SSTF) in Omaha, Nebraska. During my time with the FBI, I have investigated multiple cases involving the possession and distribution of controlled substances. Prior to working for the FBI, I was a Special Agent in the United States Secret Service where I investigated large scale financial crimes. Prior to that, I was a Police Officer for the United States Capitol Police in Washington, D.C.
3. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, in that I am empowered by law to conduct investigations and to make arrests for federal felony offenses.
4. Through personal participation; interviews with, and analysis of reports submitted by other law enforcement personnel; database inquiries; and surveillance, I am familiar with this investigation. On the basis of this familiarity, I allege that on or about May 11, 2020, in the District of Nebraska, Terrance TRAYNHAM violated federal law, to wit: distribution of a controlled substance, to wit: fentanyl, in violation of 21 U.S.C §§ 841(a)(1) and (b)(1)(C).
5. Because this affidavit is being submitted for the limited purpose of securing a Criminal Complaint and Arrest Warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that TRAYNHAM committed a violation of 21 U.S.C §§ 841(a)(1).
6. On May 9, 2020, a confidential human source, hereinafter referred to as CI, contacted a member of the FBI SSTF in regards to the illegal narcotic sales of TRAYNHAM. The CI advised that TRAYNHAM wanted to sell the CI fentanyl pills and possibly a firearm for \$1400.
7. On May 11, 2020, at 1812 hours, the CI made a recorded telephone call to TRAYNHAM in which the CI stated, "What's up bro. You still there right?" Based on affiant's training and experience, affiant believes that the phone call between CS-1 and TRAYNHAM was an inquiry by CS-1 about the location of TRAYNHAM for the purpose of the CI obtaining narcotics. The voice on the other telephone then stated "yeah". At 1818 hours, the CI was given \$1400 in buy money and then outfitted with video and audio recording equipment. At 1823 hours, the CI arrived and then went inside TRAYNHAM's residence located at 2413 Ohio Street, Omaha, NE. At 1829 hours, the CI exited TRAYNHAM's residence. The CI was then followed back to the brief location by an SSTF member. The CI then gave an SSTF member a baggie containing pills. The CI was unable to purchase the firearm. During the debrief, the CI advised that the CI gave TRAYNHAM the buy money and then TRAYNHAM counted out thirty pills for the CI. The pills

were booked into evidence at the Omaha Police Department. The controlled buy was audio and video recorded using the equipment that was outfitted on the CI.

8. The NPSL tested a representative sample of one pill sold by TRAYNHAM to the CS-1 on May 9, 2020. The NPSL determined that pill to be a combination of Fentanyl, 4-ANPP (fentanyl precursor), a fentanyl analog, and OTC painkillers.

SUMMARY

9. Based upon the foregoing, I believe that there is probable cause to believe that TRAYNHAM violated Title 21 U.S.C. §§ 841(a)(1), distribution of a controlled substance, to wit: fentanyl (schedule II). I respectfully request that the Court issue a criminal complaint and arrest warrant for TRAYNHAM.

10. Affiant requests that this criminal complaint, affidavit, arrest warrant, and all accompanying documents be sealed until further order of the Court. Disclosure of this criminal complaint, arrest warrant, affidavit, and accompanying documents may jeopardize law enforcement's ability to arrest TRAYNHAM and it may put agents in danger in attempting to arrest him.



Paul Voss, Special Agent
Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence on the 18th day of July, 2020, at Omaha, Nebraska.



Michael D. Nelson
United States Magistrate Judge